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3 Eastern District of Washington
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10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF WASHINGTON

12 UNITED STATES OF AMERICA,

13 1:22-CR-02007-MKD-1

14 Plaintiff,

15 v.
16 UNITED STATES' SENTENCING
17 MEMORANDUM

18 PAUL LAWRENCE SYLVESTER,

19 Defendant.

20 The United States of America, by and through Vanessa R. Waldref,
21 United States Attorney for the Eastern District of Washington, and Todd M.
22 Swensen, Assistant United States Attorney, submits the following United States'
23 Sentencing Memorandum:

24 **I. Offense Level & Criminal History:**

25 The United States concurs with the Presentence Investigation Report
26 (PSR) that the base offense level here is 26 and Total Offense Level calculation
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1 of 21. The United States also concurs with Probation's assessment of
2 Defendant's criminal history category of III.

3 **II. Departures:**

4 The United States has not identified any downward and/or upward
5 departures warranted under the Guidelines.

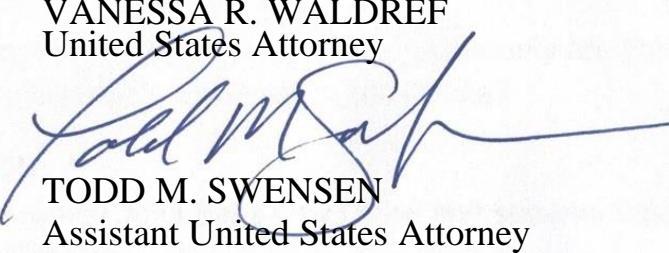
6 **III. 18 U.S.C. § 3553(a):**

7 The United States has no Section 3553(a) information beyond what is
8 included in the PSR. The United States believes that guideline range detailed in
9 the PSR is a sufficient sentence, but not greater than necessary to comply with the
10 purposes of 18 U.S.C. § 3553.

11 Based on the information above, the United States will request a 33-month
12 prison sentence to be followed by 5 years of supervised release.

13 DATED this 23rd day of January 2024.

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18 VANESSA R. WALDREF
19 United States Attorney

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21 TODD M. SWENSEN
22 Assistant United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, and a copy was emailed to the counsel of record in this case: Robert Flennaugh.

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